

Executive Summary – Enforcement Matter – Case No. 48598
Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.)
RN102993144
Docket No. 2014-0600-WQ-E

Order Type:

Findings Agreed Order

Findings Order Justification:

People or environmental receptors have been exposed to pollutants which exceed levels that are protective.

Media:

WQ

Small Business:

No

Location(s) Where Violation(s) Occurred:

American Eagle Airlines, located at the northeast section of the Dallas-Fort Worth International Airport, Dallas County

Type of Operation:

De-icing pad

Other Significant Matters:

Additional Pending Enforcement Actions: No

Past-Due Penalties: No

Other: N/A

Interested Third-Parties: None

Texas Register Publication Date: September 12, 2014

Comments Received: No

Penalty Information

Total Penalty Assessed: \$11,250

Amount Deferred for Expedited Settlement: \$0

Amount Deferred for Financial Inability to Pay: \$0

Total Paid to General Revenue: \$11,250

Total Due to General Revenue: \$0

Payment Plan: N/A

SEP Conditional Offset: \$0

Name of SEP: N/A

Compliance History Classifications:

Person/CN - Satisfactory

Site/RN - Unclassified

Major Source: No

Statutory Limit Adjustment: N/A

Applicable Penalty Policy: April 2014

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RN102993144
Docket No. 2014-0600-WQ-E

Investigation Information

Complaint Date(s): N/A

Complaint Information: N/A

Date(s) of Investigation: February 12, 2014 through February 13, 2014

Date(s) of NOE(s): April 17, 2014

Violation Information

Failed to prevent an unauthorized discharge of de-icing fluid from aircraft de-icing activities into water in the state [TEX. WATER CODE § 26.121(a)].

Corrective Actions/Technical Requirements

Corrective Action(s) Completed:

The release occurred during a winter storm when there was high demand for use of the de-icing pads and the airport was taking measures to accommodate the needs of multiple carriers. The Respondent reported the release on February 12, 2014 immediately upon determining a reportable release had occurred and promptly began response actions to prevent further migration of the de-icing fluid in the receiving stream. The Respondent flushed the affected storm water line, removed affected water and debris from the creek and properly disposed of it. Upon completion of the remedial actions, the Respondent conducted confirmation sampling to confirm that levels of contaminants in the creek were below the target cleanup levels established by the TCEQ regional office; and by February 21, 2014, the Respondent had completed all response actions.

Technical Requirements:

N/A

Litigation Information

Date Petition(s) Filed: N/A

Date Answer(s) Filed: N/A

SOAH Referral Date: N/A

Hearing Date(s): N/A

Settlement Date: N/A

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Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.)
RN102993144
Docket No. 2014-0600-WQ-E

Contact Information

TCEQ Attorney: N/A

TCEQ Enforcement Coordinator: Alejandro Laje, Enforcement Division,
Enforcement Team 3, MC 169, (512) 239-2547; Candy Garrett, Enforcement Division,
MC 219, (512) 239-1456

TCEQ SEP Coordinator: N/A

Respondent: James Johnson, Chief Environmental Council, Envoy Air Inc. (formerly
known as AMERICAN EAGLE AIRLINES, INC.), 4333 Amon Carter Boulevard, MD
5675, Fort Worth, Texas 76155-2605

Gregory C. Ricketts, Vice President DFW HUB, Envoy Air Inc. (formerly known as
AMERICAN EAGLE AIRLINES, INC.), 4333 Amon Carter Boulevard, MD 5675, Fort
Worth, Texas 76155-2605

Respondent's Attorney: N/A



Penalty Calculation Worksheet (PCW)

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

TCEQ

DATES

Assigned

24-Apr-2014

PCW

28-Apr-2014

Screening

24-Apr-2014

EPA Due

RESPONDENT/FACILITY INFORMATION

Respondent Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.)

Reg. Ent. Ref. No. RN102993144

Facility/Site Region 4-Dallas/Fort Worth

Major/Minor Source Minor

CASE INFORMATION

Enf./Case ID No. 48598

Docket No. 2014-0600-WQ-E

Media Program(s) Water Quality

Multi-Media

No. of Violations 1

Order Type Findings

Government/Non-Profit No

Enf. Coordinator Jorge Ibarra, P.E.

EC's Team Enforcement Team 3

Admin. Penalty \$ Limit Minimum

\$0

Maximum

\$25,000

Penalty Calculation Section

TOTAL BASE PENALTY (Sum of violation base penalties)

Subtotal 1

\$15,000

ADJUSTMENTS (+/-) TO SUBTOTAL 1

Subtotals 2-7 are obtained by multiplying the Total Base Penalty (Subtotal 1) by the indicated percentage.

Compliance History

0.0% Enhancement

Subtotals 2, 3, & 7

\$0

Notes

No adjustment for compliance history.

Culpability

No

0.0% Enhancement

Subtotal 4

\$0

Notes

The Respondent does not meet the culpability criteria.

Good Faith Effort to Comply Total Adjustments

Subtotal 5

-\$3,750

Economic Benefit

0.0% Enhancement*

Subtotal 6

\$0

Total EB Amounts \$3

Approx. Cost of Compliance \$2,000

*Capped at the Total EB \$ Amount

SUM OF SUBTOTALS 1-7

Final Subtotal

\$11,250

OTHER FACTORS AS JUSTICE MAY REQUIRE

0.0%

Adjustment

\$0

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

Final Penalty Amount

\$11,250

STATUTORY LIMIT ADJUSTMENT

Final Assessed Penalty

\$11,250

DEFERRAL

0.0%

Reduction

Adjustment

\$0

Reduces the Final Assessed Penalty by the indicated percentage. (Enter number only; e.g. 20 for 20% reduction.)

Notes

No deferral is recommended for Findings Orders.

PAYABLE PENALTY

\$11,250

Screening Date 24-Apr-2014

Docket No. 2014-0600-WQ-E

PCW

Respondent Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.)

Case ID No. 48598

Policy Revision 4 (April 2014)

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102993144

Media [Statute] Water Quality

Enf. Coordinator Jorge Ibarra, P.E.

Compliance History Worksheet

>> Compliance History Site Enhancement (Subtotal 2)

Component	Number of...	Enter Number Here	Adjust.
NOVs	Written notices of violation ("NOVs") with same or similar violations as those in the current enforcement action (<i>number of NOVs meeting criteria</i>)	0	0%
	Other written NOVs	0	0%
Orders	Any agreed final enforcement orders containing a denial of liability (<i>number of orders meeting criteria</i>)	0	0%
	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments and Consent Decrees	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (<i>number of judgments or consent decrees meeting criteria</i>)	0	0%
	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (<i>number of counts</i>)	0	0%
Emissions	Chronic excessive emissions events (<i>number of events</i>)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which notices were submitted</i>)	0	0%
	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (<i>number of audits for which violations were disclosed</i>)	0	0%

Please Enter Yes or No

Other	Environmental management systems in place for one year or more	No	0%
	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%

Adjustment Percentage (Subtotal 2) 0%

>> Repeat Violator (Subtotal 3)

No

Adjustment Percentage (Subtotal 3) 0%

>> Compliance History Person Classification (Subtotal 7)

Satisfactory Performer

Adjustment Percentage (Subtotal 7) 0%

>> Compliance History Summary

Compliance History Notes

No adjustment for compliance history.

Total Compliance History Adjustment Percentage (Subtotals 2, 3, & 7) 0%

>> Final Compliance History Adjustment

Final Adjustment Percentage *capped at 100% 0%

Screening Date 24-Apr-2014

Docket No. 2014-0600-WQ-E

PCW

Respondent Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.)

Policy Revision 4 (April 2014)

Case ID No. 48598

PCW Revision March 26, 2014

Reg. Ent. Reference No. RN102993144

Media [Statute] Water Quality

Enf. Coordinator Jorge Ibarra, P.E.

Violation Number 1

Rule Cite(s)

Tex. Water Code § 26.121(a)

Violation Description

Failed to prevent an unauthorized discharge of de-icing fluid from aircraft de-icing activities into water in the state. Specifically, during an investigation conducted on February 12 and 13, 2014, it was documented that on February 10 and 11, 2014, less than 1,000 pounds of ethylene glycol, a constituent of aircraft de-icing fluid, from aircraft de-icing operations was discharged into the Dallas-Fort Worth ("DFW") International Airport storm water system. The de-icing fluid reached DFW's Outfall No. 69 and into Hackberry Creek, resulting in approximately 50 dead minnows, catfish and bluegills.

Base Penalty \$25,000

>> Environmental, Property and Human Health Matrix

OR

Release	Major	Moderate	Minor
Actual	x		
Potential			

Percent 30.0%

>> Programmatic Matrix

Falsification	Major	Moderate	Minor

Percent 0.0%

Matrix Notes

Failure to prevent an unauthorized discharge of de-icing fluid into water in the state resulted in the release of pollutants which exceeded levels that are protective of human health and the environment.

Adjustment \$17,500

\$7,500

Violation Events

Number of Violation Events 2

2 Number of violation days

mark only one with an x	daily	x
	weekly	
	monthly	
	quarterly	
	semiannual	
	annual	
	single event	

Violation Base Penalty \$15,000

Two daily events are recommended.

Good Faith Efforts to Comply

25.0% Reduction

\$3,750

	Before NOV	NOV to EDRP/Settlement Offer
Extraordinary		
Ordinary	x	
N/A		(mark with x)

Notes

The Respondent achieved compliance by February 21, 2014.

Violation Subtotal \$11,250

Economic Benefit (EB) for this violation

Statutory Limit Test

Estimated EB Amount \$3

Violation Final Penalty Total \$11,250

This violation Final Assessed Penalty (adjusted for limits) \$11,250

Economic Benefit Worksheet

Respondent Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.)
Case ID No. 48598
Reg. Ent. Reference No. RN102993144
Media Water Quality
Violation No. 1

Percent Interest	Years of Depreciation
5.0	15

Item Description	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
No commas or \$							

Delayed Costs

Equipment				0.00	\$0	\$0	\$0
Buildings				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0
Engineering/Construction				0.00	\$0	\$0	\$0
Land				0.00	\$0	n/a	\$0
Record Keeping System				0.00	\$0	n/a	\$0
Training/Sampling				0.00	\$0	n/a	\$0
Remediation/Disposal				0.00	\$0	n/a	\$0
Permit Costs				0.00	\$0	n/a	\$0
Other (as needed)	\$2,000	10-Feb-2014	21-Feb-2014	0.03	\$3	n/a	\$3

Notes for DELAYED costs

Estimated cost to include flushing of the affected storm water line and proper disposal of all collected contaminated water and debris. Date required is the date of the unauthorized discharge and the final date is the date all corrective actions concluded.

Avoided Costs

ANNUALIZE [1] avoided costs before entering item (except for one-time avoided costs)

Disposal				0.00	\$0	\$0	\$0
Personnel				0.00	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.00	\$0	\$0	\$0
Supplies/Equipment				0.00	\$0	\$0	\$0
Financial Assurance [2]				0.00	\$0	\$0	\$0
ONE-TIME avoided costs [3]				0.00	\$0	\$0	\$0
Other (as needed)				0.00	\$0	\$0	\$0

Notes for AVOIDED costs

Approx. Cost of Compliance

\$2,000

TOTAL

\$3



Compliance History Report

PUBLISHED Compliance History Report for CN600126841, RN102993144, Rating Year 2013 which includes Compliance History (CH) components from September 1, 2008, through August 31, 2013.

Customer, Respondent, or Owner/Operator:	CN600126841, Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.)	Classification: SATISFACTORY	Rating: 0.22
Regulated Entity:	RN102993144, AMERICAN EAGLE AIRLINES	Classification: UNCLASSIFIED	Rating: -----
Complexity Points:	5	Repeat Violator:	NO
CH Group:	14 - Other		
Location:	NORTHEAST SECTION OF THE DALLAS-FORT WORTH INTERNATIONAL AIRPORT IN DALLAS COUNTY, TEXAS		
TCEQ Region:	REGION 04 - DFW METROPLEX		
ID Number(s):			
AIR NEW SOURCE PERMITS REGISTRATION 46499	AIR NEW SOURCE PERMITS ACCOUNT NUMBER TA4063N		
AIR NEW SOURCE PERMITS REGISTRATION 45403	WATER QUALITY NON PERMITTED ID NUMBER R04102993144		
Compliance History Period:	September 01, 2008 to August 31, 2013	Rating Year: 2013	Rating Date: 09/01/2013
Date Compliance History Report Prepared:	April 24, 2014		
Agency Decision Requiring Compliance History:	Enforcement		
Component Period Selected:	April 24, 2009 to April 24, 2014		
TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.			
Name:	Alejandro Laje	Phone:	(512) 239-2547

Site and Owner/Operator History:

- 1) Has the site been in existence and/or operation for the full five year compliance period? YES
- 2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO
- 3) If **YES** for #2, who is the current owner/operator? N/A
- 4) If **YES** for #2, who was/were the prior owner(s)/operator(s)? N/A
- 5) If **YES**, when did the change(s) in owner or operator occur? N/A

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:

N/A

B. Criminal convictions:

N/A

C. Chronic excessive emissions events:

N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):

N/A

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):

A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.

N/A

F. Environmental audits:

N/A

G. Type of environmental management systems (EMSs):

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



**IN THE MATTER OF AN
ENFORCEMENT ACTION
CONCERNING
ENVOY AIR INC. (FORMERLY
KNOWN AS AMERICAN EAGLE
AIRLINES, INC.)
RN102993144**

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**BEFORE THE

TEXAS COMMISSION ON

ENVIRONMENTAL QUALITY**

AGREED ORDER DOCKET NO. 2014-0600-WQ-E

At its _____ agenda, the Texas Commission on Environmental Quality ("the Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.) ("Respondent") under the authority of TEX. WATER CODE chs. 7 and 26. The Executive Director of the TCEQ, through the Enforcement Division, and the Respondent presented this agreement to the Commission.

The Respondent understands that it has certain procedural rights at certain points in the enforcement process, including, but not limited to, the right to formal notice of violations, notice of an evidentiary hearing, the right to an evidentiary hearing, and a right to appeal. By entering into this Agreed Order, the Respondent agrees to waive all notice and procedural rights.

It is further understood and agreed that this Order represents the complete and fully-integrated settlement of the parties. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable. The duties and responsibilities imposed by this Agreed Order are binding upon the Respondent.

The Commission makes the following Findings of Fact and Conclusions of Law:

I. FINDINGS OF FACT

1. The Respondent, authorized under contract, operates a de-icing pad located at the northeast section of the Dallas-Fort Worth ("DFW") International Airport in Dallas County, Texas (the "Facility").
2. The Respondent has caused, suffered, allowed or permitted the discharge of any waste or the performance of any activity in violation of TEX. WATER CODE ch. 26 or any rule, permit, or order of the Commission.
3. During an investigation conducted on February 12 and 13, 2014, TCEQ staff documented that the Respondent did not prevent an unauthorized discharge of de-icing fluid from aircraft de-icing activities into water in the state. Specifically, it was documented that on February 10 and 11, 2014, less than 1,000 pounds of ethylene glycol, a constituent of aircraft de-icing fluid, from aircraft de-icing operations was discharged into the DFW International Airport storm water system. The de-icing fluid reached DFW's Outfall No. 69 and ultimately Hackberry Creek, where approximately 50 dead minnows, catfish and bluegills were observed.
4. The Respondent received notice of the violations on April 21, 2014.
5. The Executive Director recognizes that: the release occurred during a winter storm when there was high demand for use of the de-icing pads and the airport was taking measures to accommodate the needs of multiple carriers. The Respondent reported the release on February 12, 2014 immediately upon determining a reportable release had occurred and promptly began response actions to prevent further migration of the de-icing fluid in the receiving stream. The Respondent flushed the affected storm water line, removed affected water and debris from the creek and properly disposed of it. Upon completion of the remedial actions, the Respondent conducted confirmation sampling to confirm that levels of contaminants in the creek were below the target cleanup levels established by the TCEQ regional office; and by February 21, 2014, the Respondent had completed all response actions.

II. CONCLUSIONS OF LAW

1. The Respondent is subject to the jurisdiction of the TCEQ pursuant to TEX. WATER CODE chs. 7 and 26 and the rules of the Commission.
2. As evidenced by Findings of Fact No. 3, the Respondent failed to prevent an unauthorized discharge of de-icing fluid from aircraft de-icing activities into water in the state, in violation of TEX. WATER CODE § 26.121(a).
3. Pursuant to TEX. WATER CODE § 7.051, the Commission has the authority to assess an administrative penalty against the Respondent for violations of the Texas Water Code and the Texas Health and Safety Code within the Commission's jurisdiction; for

violations of rules adopted under such statutes; or for violations of orders or permits issued under such statutes.

4. An administrative penalty in the amount of Eleven Thousand Two Hundred Fifty Dollars (\$11,250) is justified by the facts recited in this Agreed Order, and considered in light of the factors set forth in TEX. WATER CODE § 7.053. The Respondent has paid the Eleven Thousand Two Hundred Fifty Dollar (\$11,250) administrative penalty.

III. ORDERING PROVISIONS

NOW, THEREFORE, THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY ORDERS that:

1. The Respondent is assessed an administrative penalty in the amount of Eleven Thousand Two Hundred Fifty Dollars (\$11,250) as set forth in Section II, Paragraph 4 above, for violations of TCEQ rules and state statutes. The payment of this administrative penalty and the Respondent's compliance with all the terms and conditions set forth in this Agreed Order completely resolve the violations set forth by this Agreed Order in this action. However, the Commission shall not be constrained in any manner from requiring corrective actions or penalties for other violations that are not raised here. Administrative penalty payments shall be made payable to "TCEQ" and shall be sent with the notation "Re: Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.), Docket No. 2014-0600-WQ-E" to:

Financial Administration Division, Revenue Operations Section
Attention: Cashier's Office, MC 214
Texas Commission on Environmental Quality
P.O. Box 13088
Austin, Texas 78711-3088

2. The provisions of this Agreed Order shall apply to and be binding upon the Respondent. The Respondent is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Facility operations referenced in this Agreed Order.
3. The Executive Director may refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings without notice to the Respondent if the Executive Director determines that the Respondent has not complied with one or more of the terms or conditions in this Agreed Order.
4. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
5. This Agreed Order, issued by the Commission, shall not be admissible against the Respondent in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the

Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.

6. This Agreed Order may be executed in separate and multiple counterparts, which together shall constitute a single instrument. Any page of this Agreed Order may be copied, scanned, digitized, converted to electronic portable document format ("pdf"), or otherwise reproduced and may be transmitted by digital or electronic transmission, including but not limited to facsimile transmission and electronic mail. Any signature affixed to this Agreed Order shall constitute an original signature for all purposes and may be used, filed, substituted, or issued for any purpose for which an original signature could be used. The term "signature" shall include manual signatures and true and accurate reproductions of manual signatures created, executed, endorsed, adopted, or authorized by the person or persons to whom the signatures are attributable. Signatures may be copied or reproduced digitally, electronically, by photocopying, engraving, imprinting, lithographing, electronic mail, facsimile transmission, stamping, or any other means or process which the Executive Director deems acceptable. In this paragraph exclusively, the terms "electronic transmission", "owner", "person", "writing", and "written" shall have the meanings assigned to them under TEX. BUS. ORG. CODE § 1.002.
7. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties. By law, the effective date of this Agreed Order is the third day after the mailing date, as provided by 30 TEX. ADMIN. CODE § 70.10(b) and TEX. GOV'T CODE § 2001.142.

SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission

Pamela Marie J
For the Executive Director

11/25/14
Date

I, the undersigned, have read and understand the attached Agreed Order in the matter of Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.) I am authorized to agree to the attached Agreed Order on behalf of Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.), and do agree to the specified terms and conditions. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I understand that by entering into this Agreed Order, Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.) waives certain procedural rights, including, but not limited to, the right to formal notice of violations addressed by this Agreed Order, notice of an evidentiary hearing, the right to an evidentiary hearing, and the right to appeal. I agree to the terms of the Agreed Order in lieu of an evidentiary hearing. This Agreed Order constitutes full and final adjudication by the Commission of the violations set forth in this Agreed Order.

I also understand that failure to comply with the Ordering Provisions, if any, in this order and/or failure to timely pay the penalty amount, may result in:

- A negative impact on compliance history;
- Greater scrutiny of any permit applications submitted;
- Referral of this case to the Attorney General's Office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions;
- Automatic referral to the Attorney General's Office of any future enforcement actions;
- and
- TCEQ seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

Gregory C. Ricketts
Signature

8/8/2014
Date

GREGORY C. RICKETTS
Name (Printed or typed)
Authorized Representative of
Envoy Air Inc. (formerly known as AMERICAN EAGLE AIRLINES, INC.)

VP DFW HUB
Title

Instructions: Send the original, signed Agreed Order with penalty payment to the Financial Administration Division, Revenue Operations Section at the address in Section III, Paragraph 1 of this Agreed Order.